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FILED IN THE
UNITED STATES DISTRICT COURT
DISTRICT OF HAWAII

JUN 21 2000

at 10 o'clock and 26 min. P.M.
WALTER A. Y. H. CHINN, CLERK

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF HAWAII

UNITED STATES OF AMERICA,) CRIM. NO. CRUT-00247
Plaintiff,) INDICTMENT
VS.) [21 U.S.C. 846, 841(a)(1)]
CHAD MASAO IMAI, (01))
ANDY JOE WATKINS, (02))
LANCE SUSUMU TANAKA, (03))
EUN AH LEE, also known (04))
as "Eunah Lee" and)
"Linda Lee",)
Defendants.)

INDICTMENT

Count 1:

The Grand Jury charges that:

From a time unknown to the grand jury up through and including on or about June 9, 2001 in the District of Hawaii and elsewhere, defendants:

CHAD MASAO IMAI,
ANDY JOE WATKINS,
LANCE SUSUMU TANAKA,
EUN AH LEE, also known as "Eunah Lee", and "Linda Lee",
known and unknown to the grand jury knowingly and

intentionally conspired to distribute and to possess with intent to distribute five (5) kilograms or more of cocaine, its salts, optical and geometric isomers, and salts of isomers, a Schedule II narcotic controlled substance,

A violation of Title 21, United States Code, Section 841(a)(1).

Overt Acts:

In furtherance of this conspiracy and in order to attain the objects thereof, the following overt acts, among others, were committed in the District of Hawaii and elsewhere:

1. On or about June 5, 2001, defendant Imai travelled from Honolulu, Hawaii, to Los Angeles, California.
2. On or about June 5, 2001, defendant Watkins travelled from Honolulu, Hawaii, to Los Angeles, California.
3. Sometime during the period on or about June 6 through on or about June 7, 2001 in the greater Los Angeles area, California, defendant Watkins arranged with another person for the purchase of more than five (5) kilograms of cocaine.
4. Sometime during the period on or about June 6, 2001 through on or about June 7, 2001, defendant Imai purchased the more than five (5) kilograms of cocaine referenced in Overt Act #3 above.
5. On or about June 7, 2001 in the greater Los Angeles area, California, defendant Imai mailed a portion of the cocaine referenced in Overt Acts #3 and #4 above to Honolulu in the following three Federal Express ("FEDEX") parcels:

(a) One (1) parcel with FEDEX tracking #829286663871, addressed to the Pine Tree, Attn: Linda Lee, 835 Keeaumoku Street #1025, Honolulu, HI (hereinafter "Parcel #1");

(b) One (1) parcel with FEDEX tracking #829286669302, addressed to the Pine Tree, Attn: Linda Lee, 835 Keeaumoku Street #1025, Honolulu, HI (hereinafter "Parcel #2"); and

(c) One (1) parcel with FEDEX tracking #829286660298, addressed to the Pine Tree, Attn: Linda Lee, 835 Keeaumoku Street #1025, Honolulu, HI (hereinafter "Parcel #3").

6. On or about June 7, 2001 in the greater Los Angeles area, California, defendant Watkins mailed a portion of the cocaine referenced in Overt Acts #3 and #4 above to Honolulu in the following FEDEX parcel:

(a) One (1) parcel with FEDEX tracking #829286657383, addressed to Lance Tanaka, 2228 Amokemoke Street, Pearl City, HI (hereinafter "Parcel #4").

7. On or about June 8, 2001 in Honolulu, Hawaii, defendant Lee took Parcel #2 to apartment #1414 of the Kapiolani Terrace Apartments located at 1560 Kanunu Street.

8. On or about June 8, 2001 in Honolulu, Hawaii, defendant Lee took Parcel #3 to apartment #1414 of the Kapiolani Terrace Apartments located at 1560 Kanunu Street.

9. On or about June 8, 2001, defendant Lee took Parcel #1 to apartment #1414 of the Kapiolani Terrace Apartments, located at 1560 Kanunu Street.

10. On or about June 8, 2001 in apartment #1414 of the Kapiolani Terrace Apartments, located at 1560 Kanunu Street, Honolulu, Hawaii, defendant Imai possessed Parcels #1, #2, and

#3.

11. On or about June 9, 2001 at the L&L Drive-In near the Honolulu International Airport, Hawaii, defendant Tanaka delivered Parcel #4 to Imai (the latter of whom by this time was no longer a member of the conspiracy).

All in violation of Title 21, United States Code, Sections 846, 841(a)(1), and 841(b)(1)(A).

Count 2:

The grand jury further charges that:

On or about June 8, 2001 in the District of Hawaii, defendants:

CHAD MASAO IMAI,
ANDY JOE WATKINS,
LANCE SUSUMU TANAKA, and
EUN AH LEE, also known as "Eunah Lee", and "Linda Lee", knowingly and intentionally attempted to possess with intent to distribute five-hundred (500) grams or more of cocaine, its salts, optical and geometric isomers, and salts of isomers, a Schedule II narcotic controlled substance, that was contained in FEDEX Parcel #1 (described in Count 1 of the Indictment),

In violation of Title 21, United States Code Sections 846, 841(a)(1), and 841(b)(1)(B) and Title 18, United States Code, Section 2.

Count 3:

The grand jury further charges that:

On or about June 8, 2001 in the District of Hawaii, defendants:

**CHAD MASAO IMAI,
ANDY JOE WATKINS,
LANCE SUSUMU TANAKA, and
EUN AH LEE**, also known as "Eunah Lee", and "Linda Lee",

knowingly and intentionally possessed with intent to distribute five (5) kilograms or more of cocaine, its salts, optical and geometric isomers, and salts of isomers, a Schedule II narcotic controlled substance, that was contained in FEDEX Parcels #2 and #3 (described in Count 1 of the Indictment),

In violation of Title 21, United States Code Sections 841(a)(1) and 841(b)(1)(A) and Title 18, United States Code, Section 2.

Count 4:

The grand jury further charges that:

Sometime during the period on or about June 8, 2001 to on or about June 9, 2001 in the District of Hawaii, defendants:

**CHAD MASAO IMAI,
ANDY JOE WATKINS,
LANCE SUSUMU TANAKA, and
EUN AH LEE**, also known as "Eunah Lee", and "Linda Lee",

knowingly and intentionally possessed with intent to distribute five-hundred (500) grams or more of cocaine, its salts, optical and geometric isomers, and salts of isomers, a Schedule II narcotic controlled substance, that was contained in FEDEX Parcel #4 (described in Count 1 of the Indictment),

In violation of Title 21, United States Code Sections 841(a)(1) and 841(b)(1)(B) and Title 18, United States Code, Section 2.

Count 5:

The Grand Jury further charges that:

On or about June 8, 2001 in the District of Hawaii, defendant:

CHAD MASAO IMAI

knowingly and intentionally possessed with intent to distribute fifty (50) grams or more of methamphetamine, its salts, isomers, and salts of its isomers, a Schedule II controlled substance,

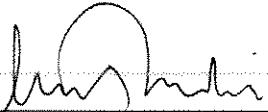
In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

DATED: Honolulu, Hawaii, June 21, 2001.

A TRUE BILL.

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GRAND JURY FOREPERSON J


ELLIOT ENOKI
United States Attorney


MICHAEL K. KAWAHARA
Assistant U.S. Attorney

USA v. Imai, Watkins, Tanaka & Lee, USDC-Hawaii, Indictment.